

**DISTRICT OF COLUMBIA
PUBLIC CHARTER SCHOOL ENROLLMENT
OCTOBER 7, 2003**



TCBA

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Executive Summary

Thompson, Cobb, Bazilio & Associates, PC (TCBA) was retained by the State Education Office of the District of Columbia (the SEO) to conduct a full census-type audit of the October 7, 2003, student enrollment for the District of Columbia Public Schools (DCPS) and public charter schools. In addition to the enrollment verification, TCBA reviewed each student file to ensure that it contained proper documentation to support residency, special education, and English language proficiency designations. This report presents the results of the census-type audit for only public charter schools; DCPS is reported separately.

This was the seventh year that a 100% verification of student enrollment and residency files for charter schools was conducted. As shown in Chart 1, the annual public charter school enrollment is increasing, while the number of DCPS enrolled students is decreasing.

and cooperation with the census process. Schools with few differences include:

- KIMA - Kamit Institute for Magnificent Achievers PCS
- Latin American Montessori Bilingual (LAMB) PCS
- Roots PCS
- Next Step PCS
- Capital City PCS
- Cesar Chavez PCHS for Public Policy
- DC Preparatory Academy PCS
- KIPP DC/KEY Academy PCS
- Howard Road Academy PCS
- Paul Junior High PCS
- Maya Angelou PCS
- The School for Arts in Learning (SAIL) PCS
- Thurgood Marshall Academy PCS
- Tree of Life Community PCS
- Tri-Community PCS

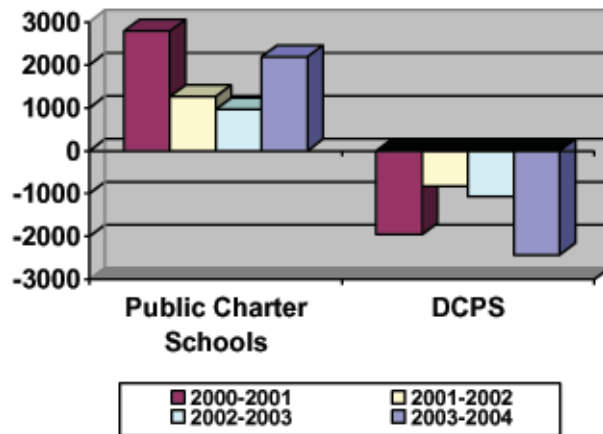


Chart 1: 4-Year Change in Enrollment (based on Reported Enrollment)

It is the nature of these reports to bring attention to discrepancies and improper adherence to policies. However, we would like to commend those schools that had no or few enrollment and residency issues remaining after the resolution process, signifying good administrative practices

The SY 2003 - 2004 Enrollment Rosters submitted by the public charter schools (Reported Enrollment) reflects a total of 14,006 students enrolled as of October 7, 2003, consisting of 3,759 students enrolled in schools chartered by the Board of Education (BOE) and 10,247 stu-



dents enrolled in schools chartered by the D.C. Public Charter School Board (PCSB). The results of the census-type audit verified:

- 3,622 students enrolled in schools chartered by BOE, and
- 10,093 students enrolled in schools chartered by PCSB.

Of the 13,715 students verified as enrolled in charter school programs, we found:

- 10 students present and attending at October 7, 2003, who were not on the Enrollment Rosters
- 138 students for whom residency verification was inadequate
- 1,321 special education students with current IEPs
- 1,483 LEP/NEP students

ENROLLMENT

Our student count as of October 7, 2003, was 13,715 without regard to residency and 13,577 for students with verified residency.

The attachments provide a breakdown of total enrollment by grade. Next Step PCS is an ungraded high school. For purposes of this audit, the students at Next Step PCS were categorized based on age as follows:

14 years old	9th grade
15 years old	10th grade
16 years old	11th grade
17 years old	12th grade

Booker T. Washington PCS offers various adult and GED programs. These students are included in the Adult column on the attachments. This category is broken down as follows for the combined day and evening programs.

	Reported	Audit
Adult	20	15
Shared	50	18
GED	26	19
	96	52

Table 1 shows the audited enrollment count for public charter school students compared to the Reported Enrollment. (See Table 2 for the breakdown of students' residency status.)

Public Charter Schools	BOE	PCSB	Total	Reported Enrollment	Difference
Total Enrollment	3,622	10,093	13,715	14,006	(291)
Enrollment with Verified Residency	3,558	10,019	13,577	14,006	(429)

Table 1: Enrollment Comparison

The enrollment count was based primarily on verification of the student's presence in the school. For students who were not present on the day of the count, we relied on the enrollment and attendance records provided by the school and assumed those documents to be accurate and complete.

RESIDENCY

Of the 13,715 students found to be enrolled, there were 138 students for whom proof of residency provided to the auditors was inadequate or unavailable.



	Resident	Non-Resident Paying Tuition	Non-Resident Not Paying Tuition	Not Verified	Total
BOE	3,557	1	-	64	3,622
PCSB	10,019	-	2	72	10,093
Total	13,576	1	2	136	13,715

Table 2: Residency

We reviewed the District Residency Verification Form (Residency Form) for every student included in the census, except students for whom no form was on file. For purposes of the audit, a properly completed and signed Residency Form was considered to have been completed in accordance with the applicable rules. During the initial review, we identified students for whom we had not seen adequate residency documentation. The principals were given an opportunity to provide the missing information. Table 2 summarizes the final results of the residency review. The "Not Verified" row includes students for whom we were not provided the necessary documentation to make a determination of residency status. (See Attachment 9.)

Hyde Leadership PCS has one non-resident student enrolled who has been assessed tuition of \$6,611 for SY 2003-2004.

This report includes both quantitative enrollment data as well as qualitative observations. Only those students who are District residents, or pay tuition, are considered properly enrolled. Therefore, the enrollment data is presented in two ways - enrollment without regard to residency and enrollment only for students who have properly proven residency or who pay tuition. The quantitative data is presented in the following attachments:

ATTACHMENTS

1. Summary of Audited Enrollment by School Type and Grade
2. Audited Enrollment by School and Grade
3. Summary by School Type and Grade: Audited Enrollment vs. Reported Enrollment
4. Summary of Enrollment by School and Grade: Audited Enrollment vs. Reported Enrollment
5. Summary of Students for Whom Enrollment and Residency were Verified By School Type and Grade
6. Summary of Students for Whom Enrollment and Residency were Verified By School and Grade
7. Summary of Students for Whom Enrollment and Residency were Verified by School Type and Grade: Audited Enrollment vs. Reported Enrollment
8. Summary of Students for Whom Enrollment and Residency were Verified by School and Grade: Audited Enrollment vs. Reported Enrollment
9. Summary of Residency Verification by School
10. Summary of Students with IEPs, including Students for Whom Residency was not Verified
11. Summary of LEP/NEP Students by School, including Students for Whom Residency was not Verified



12. Summary of Students with IEPs, including Students for Whom Residency was not Verified: Aligned to Proposed Funding Formula Legislation
13. Summary of Students with IEPs for Whom Enrollment and Residency were Verified
14. Summary of LEP/NEP Students for Whom Enrollment and Residency were Verified
15. Summary of Students with IEPs for Whom Enrollment and Residency Were Verified: Aligned to Proposed Funding Formula Legislation

The qualitative findings are discussed in detail in the Observations section of this report. Many of the anomalies that we discovered during the census-type audit can be addressed through a few comprehensive recommendations. Some of these recommendations were made last year; based on our review this year, we believe they bear repeating.

RECOMMENDATIONS

Many of the deficiencies noted last year are repeated this year. This is not to say that there have not been improvements. There seemed to be a more widespread understanding of the correlation between the audit and funding, and therefore, the importance of the audit, but some schools continue to have the same problems year to year. In summarizing our observations, there are four themes that continually arose.

1. Leadership
2. Consistency
3. Training
4. Communication

Not surprisingly, the schools that appeared to have strong leadership were the easiest to audit. The records were in good order, the staff was cooperative, and the principal participated.

Generally, the principal's attitude was evident through his/her staff. Although there were few schools where the principal did not participate in the audit process, the audit results suggest schools would benefit from strengthened leadership via training. We suggest that the audit process begin before enrollment begins for the following school year. A common phrase heard during the audit was "no one told me." By orienting principals to the process and document requirements at the front-end rather than after the fact, the process may be less adversarial and yield better results.

More consistency in attendance reporting within public charter schools would be advantageous to avoid confusion and misinterpretation of data. Standards would provide a control for properly documenting student attendance. We recognize that as individual local education agencies (LEAs), charter schools establish their own policies and procedures. However, we noted repeated instances of inconsistency within a school. It was even not unusual to see teachers being inconsistent in their own attendance documentation.

An accurate enrollment count is necessary for funding. While a census-type audit is currently mandated, one objective is to be able to modify the audit to place more reliance on the information systems. In order for this approach to be successful, controls would have to be in place and operating to ensure data integrity. Such controls would include standardization of procedures, automated attendance tracking, and periodic auditing of attendance records. We understand that both Chartering Authorities are currently working with the schools to implement new student information systems. Along with implementation of the systems, we urge development of standard practices and controls.



The principals we interviewed stated that they are notified of residency verification changes through meetings and written notice. However, despite these information venues, principals were not aware of key residency requirements. We repeatedly encountered principals or staff who claimed not to know that residency had to be verified after July 1, that receipts were required when using leases or utility bills to prove residency, or that two utility bills do not qualify as two forms of residency evidence. Some believed these to be requirements imposed by the audit rather than the established rules for verifying residency. For special education students, we saw various interpretations for completing and amending IEPs (Individualized Education Programs). While each charter school operates as its own LEA, coordinated training would be beneficial. The Chartering Authorities, in conjunction with the SEO and appropriate DCPS agencies, should consider developing training programs for core procedures such as residency, attendance tracking, IEP preparation, and language assessment. The training should consider:

- Who should be trained?
- What format and materials are best suited to reach people with varied learning habits?

Unlike DCPS, public charter schools do not have an effective means of communication and coordination of information. While the Chartering Authorities serve in a coordination role, some charter school principals seem to need more direct communication. Some charter school principals expressed frustration with a lack of communication on issues such as revision of policies impacting charter schools, new legislation, revised rules, and so forth.

RESIDENCY

We recommend that the SEO undertake a project to revamp the process used to verify residen-

cy. The current process is burdensome to the school staff and the parents. It can also be circumvented and is not strictly adhered to by all schools. As recommended in previous years, we believe that the objectives of residency verification can be achieved more efficiently and thoroughly through one, or a combination, of the following:

1. Automated matching of files available in systems throughout the District, such as the Office of Tax and Revenue, the Department of Human Services, or the Department of Motor Vehicles;
2. Establishing central centers for residency verification; and
3. Outsourcing to reduce the burden on schools and strengthen controls.

If these methods cannot be implemented, we recommend that:

1. Schools maintain copies of the documents used to prove residency, if privacy policies allow;
2. The Chartering Authorities conduct periodic audits of the residency files to ensure compliance with the residency verification rules; and
3. The SEO develop guidelines for the use of the residency verification rules (discussed in detail in the Observations section of this report).

SYSTEM MAINTENANCE

In past audits reports, we have cited the need for a central system to consolidate information regarding students attending public charter schools and/or combining that information with DCPS. Information concerning students in the District is fragmented between those attending DCPS and those attending individual public charter schools. Because there is no comprehensive



system incorporating the public charter school students, the District has no means to track and monitor all of the students served by the District. This impacts the District's ability to determine a true enrollment number, including special education students and English Language Learners; a school's ability to know whether a transferring student requires special education or language services; and a school's ability to schedule a transferring student appropriately.

In the Observations section of this report, we discuss areas of concern that point to the need for a centralized student database. Ideally, this would be consolidated with DCPS to facilitate District-wide reporting, track student enrollment and enrollment changes, and minimize the risk that students are counted as "enrolled" in more than one school. DCPS is in the process of implementing a new student information system. We understand that the BOE charter schools will be implementing the same system. This will greatly improve the consistency and availability of information. These improvements would be enhanced if the BOE charter school system was merged with or interfaced with the DCPS system. We also understand that the PCSB is in the process of implementing a new system to be used by all of its schools for tracking student information. Having the public charter schools move to a uniform system is a major step toward more reliable enrollment information.

STUDENTS ENROLLED IN MULTIPLE PROGRAMS

The Uniform Per Student Funding Formula provides the definitions for determining the annual payments to charter schools and the DCPS for the funding of students in adult education programs and ungraded students in high school programs. However, it does not address students who attend multiple programs. This affects the

Booker T. Washington Public Charter School. Currently, students who attend a day school program and an evening program are included in the enrollment count of only the day school. We recommend that the SEO review the policies regarding funding for students in multiple programs to ensure that funding is evenly dispersed.



Observations

RESIDENCY

Although significant improvements have been made each year, residency verification continues to be an issue at a few public charter schools. Following a policy established by DCPS, some public charter schools elected not to keep copies of the residency proofs; therefore, the audit process was limited to determining if the school had completed the required form. However, the fact that a completed form is on file does not guarantee that valid proof was provided. After the initial review, we gave the principals an opportunity to provide the proof of residency for students for whom the Residency Forms were incomplete. In reviewing the documentation provided, we found that the residency requirements are not being strictly adhered to. For instance, when accepting leases and utility bills as proof of residency, the cancelled checks or receipt of payment are often not included. Many principals claimed that they were unaware of this requirement although it is clearly stated on the Residency Verification Form.

PROOF OF RESIDENCY MISSING FOR SOME ENROLLED STUDENTS

Of the 13,715 students included in TCBA's enrollment count of students in pre-school, pre-kindergarten, kindergarten, grades 1-12, and non-grade level programs in public charter schools, the residency status of 138 students was classified as "not verified". In some cases, Residency Forms were on file but missing vital information, such as the check-off for the required proof or the school official's signature. Students for whom adequate documentation was not provided during the resolution process remained as "Not Verified".

RESIDENCY RULES SHOULD BE CLARIFIED

In June 2001, the SEO issued rules regarding residency verification. These rules established the documentation required to prove residency for

the purpose of school enrollment. We recommend that the SEO develop and distribute guidelines to eliminate inconsistencies and clarify requirements. Specifics to be considered include:

- Clarification of documentation requirements to prove payment of D.C. taxes. The Residency Form lists forms W-2 and 1099 from the previous year. Although the rules state that a tax return is not acceptable, this is not stated on the Residency Form. We saw many instances of a Federal tax return being accepted although it shows no evidence of payment of District taxes.
- The use of a prior year W-2 is inconsistent with the requirement that a pay stub be issued within 45 days of proving residency. During the time of enrollment, the W-2 will be 6 - 10 months old. The current pay stub is better evidence of current residency.
- Guidance on what constitutes "current official documentation of financial assistance received from persons enrolling the student from the Government of the District of Columbia". Absent guidance, schools are accepting a variety of documents. Supplemental Security Income is listed as an example, although this is not assistance from the District Government, so letters from the Social Security Administration are accepted. We have seen photo identifications from the Department of Human Services dated as far back as 1987 and copies on envelopes from different District offices.
- Inclusion of the use of embassy letters. Based on oral approval from the Office of Residency, schools are accepting letters from embassies to verify residency. However, many of these letters state only that the student's parents are employees of the embassy rather than living at the embassy. Further, the rule should define those entities considered to be embassies; we have seen letters



from organization such as the Center for Hellenic Studies.

- Acceptable documentation for wards of the District. We have seen a number of letters from non-profit organizations that operate foster care networks.
- Clarification of acceptable utility bills and that another form of proof is required when one is a utility bill. The Residency Form excludes telephone bills, but should also address utility-type bills, such as cable television.
- Reinforcement of the requirement for receipts with utility bills and leases and clarification that the receipt is intended to show that payment is being made by the person enrolling the student. We saw many instances where a credit amount on the invoice is being accepted as proof of payment. More often, however, we found that the requirement for receipts was overlooked.
- Reduction in the 45 days allowed for a principal to conduct a home visit. Parents have 10 days after enrolling a child to prove residency. If unable to provide the documents, they have the option of consenting to a home visit. The principal then has 45 days to conduct the home visit. Therefore, a student can be enrolled for 55 days before residency is verified.

SCHOOLS NOT ADHERING TO RESIDENCY VERIFICATION RULES

District regulations require that residency be verified for all students on an annual basis in accordance with current guidelines. Some schools did not adhere to this policy.

- Several schools used outdated forms and, therefore, accepted types of proof that are

no longer allowed, such as voter registration cards.

- One school created its own residency form, inappropriately listing "a copy of a 1999 tax return", D.C. voter registration, and title to residential property in the District as valid residency proofs.
- Several schools accepted inappropriate tax verification documents such as 1040 tax returns, annuity payment statements, and computer generated forms from unknown sources that indicated D.C. taxes.
- There were a few instances of W-2 forms showing Maryland tax withholding.

POLICY NOT ADHERED TO FOR WITHDRAWING STUDENTS

The guidelines require that students for whom the required proofs of residency are not obtained prior to the official membership date, or within 10 days after the enrollment date, be withdrawn from school and excluded from the count. In our initial review of Residency Forms, we found many that lacked the proper number of proofs. Therefore, under the guidelines, these students should have been withdrawn.

ATTENDANCE

STUDENTS ABSENT ON THE DAY OF THE COUNT

Absenteeism continues to be high in some of the schools. We have been informed by the Chartering Authorities that all public charter schools have adopted DCPS policy to withdraw any student who is absent for 20 consecutive days. However, our findings indicate that this policy was not always complied with.



Table 3 summarizes the absentee rate for schools on the day that we performed the student counts.

if a student has perfect attendance, the attendance record will be blank. This does not pro-

	Total in Enrollment Data	Absent on the Day of the Count	Percentage
BOE	3,759	602	16%
PCSB	10,247	1,269	12%
Total Charter Schools	14,006	1,871	13%

Table 3: Absenteeism Rates

Note: Absentee rates are based on the Enrollment Data as provided rather than the final census.

Table 4 highlights schools with absentee rates greater than 20%.

ATTENDANCE EXCEPTION BASED

Some of the attendance tracking systems are exception-based, that is, only days when a student is other than "Present" are captured. Therefore,

vide the schools with adequate information to monitor attendance. For instance, a blank record could indicate that the student was never included on any attendance rosters (not assigned a count location) or that the student was a "no-show". Accuracy of attendance data is absolutely necessary in determining whether a student is actually enrolled at a given school. This can be seen most clearly when looking at duplicate records. Upon combining the enrollment rosters

School	Percentage
Booker T Washington PCS	28%
Booker T Washington PCS – Evening	34%
The Village Learning Center – High School	24%
Jos-Arz Academy PCS	62%
Options	40%
Next Step PCS	36%
Carlos Rosario International PCS	26%
New School for Enterprise and Development PCS	25%
Washington Mathematics, Science, and Technology PCS	17%

Table 4: Significant Absenteeism Rates by School



provided by the public charter schools and the DCPS enrollment data, we found the following duplicate records for public charter school students (not mutually exclusive):

- 4,861 students with matching names, i.e., at least 2 students have exactly the same name;
- 890 students with matching student ID numbers;
- 798 students with a combination of matching name and grade
- 220 students with a combination of matching name and date of birth
- 202 students with a combination of matching name and student identification number

In conducting the census, we had to determine, to the extent possible, those students from the above populations who were in fact the same student being shown as enrolled at two different schools. The attendance records are the primary source for making that determination. However, because some attendance records are exception based, it is possible for students to appear to be attending two different schools.

ATTENDANCE DOCUMENTATION PROCEDURES SHOULD BE STANDARDIZED

While there are some basic standards established, e.g. attendance is to be taken daily and submitted by a certain time each day, there is no standard in use as to the form that the documentation should take. While the benefit of non-standardized records is flexibility to teachers, the drawback is the creation of inconsistencies, especially in the method that a teacher chooses to document his/her roll. As a result, the information may be confusing to interpret for reporting purposes. On the attendance cards that we reviewed, we have seen "present" documented as any of the following: "P", blank, check mark, dot, time, and grade.

In conjunction with implementing the new student information systems, we recommend that public charter schools establish a standard for documenting attendance and require all teachers to use it. The standard should be easy to document, read, and interpret. For instance, "A" for Absent, "P" for Present, "T" for Tardy, and "S" for suspension. The standard should be comprehensive enough to cover the various attendance categories required for reporting, but not so cumbersome that it is not used.

STUDENTS NOT WITHDRAWN FOR EXCESSIVE ABSENCE

Aside from the role that attendance monitoring plays in student performance, there are funding issues. District policy requires that students absent for 20 consecutive days be withdrawn. According to the Chartering Authorities, the public charter schools have adopted this policy. This policy is not enforced because, in part, attendance records may not be providing a true record of absences. Students are being carried in enrollment who have actually transferred to other schools. Of the 1,871 students absent on the day of the count, we determined that 271 were not attending on October 7th, either because they were found to have withdrawn (or stopped attending) prior to October 7th, were found to be attending another school, or attendance documentation, if provided, did not provide clear evidence of enrollment. In the absence of a consolidated student information system, there is currently no means for detecting students who transferred to another school. When we combined the DCPS Student Information System (SIS) records with the enrollment rosters provided by the public charter schools, we identified pairs of students listed as enrolled in both DCPS and public charter schools or two charter schools. We recommend that public charter schools investigate a more effective means for gathering attendance information. Recording attendance every



day rather than on the exception basis will provide better information for attendance monitoring and enrollment. Also, expand the use of technology to capture attendance. Barcoded ID cards can be used to scan attendance. This is currently being done with great success at Cesar Chavez Public Charter High School for Public Policy. Some schools are also using on-line attendance systems which are updated in the classroom.

WITHDRAWAL AND TRANSFER DATES NOT ACCURATE

The student population is transient. As a result, attendance records at any given point in time will have a degree of inaccuracy. To some extent, these inaccuracies are not errors on the part of the school staff. One contributing factor to the differences noted between the Reported Enrollment and the Audited Enrollment as of October 7, is the fact that the audit is conducted subsequent to October 7. Therefore, the audit has the benefit of information not available to the school. Frequently a student will be absent for some number of days before the parent offi-

cially withdraws the student. In some cases, the student is never officially withdrawn but is dropped from the roster after 20 consecutive absences. In either case, the school may not have enough information on October 7 to know that the student will not be returning.

Because the objective of the audit is to determine the number of students enrolled as of October 7, we consider subsequent information to make that determination. Because the audit has access to the enrollment records for all schools, including DCPS, we are able to determine if a student had, in fact, withdrawn or transferred prior to October 7.

Following are examples of documents provided by the schools that demonstrate the attendance recordation problems discussed above. Names of students are not shown, but each example is for a particular student. Each of these examples shows that the attendance records provided by DCPS and the public charter school indicate that the same student is attending both schools.



Attendance Records for the Same Student at a Charter School and a DCPS School

Charter

09-12-2003	PRESENT*
09-13-2003	PRESENT*
09-16-2003	PRESENT*
09-17-2003	PRESENT*
09-23-2003	PRESENT*
09-24-2003	PRESENT*
09-25-2003	PRESENT*
09-26-2003	PRESENT*
09-29-2003	PRESENT*
09-30-2003	PRESENT*
10-01-2003	PRESENT*
10-02-2003	PRESENT*
10-03-2003	PRESENT*
10-06-2003	PRESENT*
10-07-2003	PRESENT*
10-08-2003	PRESENT*
10-09-2003	PRESENT*
10-10-2003	PRESENT*
10-14-2003	PRESENT*
10-15-2003	PRESENT*
10-16-2003	PRESENT*
10-17-2003	PRESENT*
10-20-2003	PRESENT*
10-21-2003	PRESENT*
10-22-2003	PRESENT*
10-23-2003	PRESENT*
10-24-2003	PRESENT*
10-27-2003	ABSENT
10-28-2003	ABSENT
10-29-2003	PRESENT*

DCPS

DATE	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
SEPTEMBER																															
OCTOBER	X		X			X	X							X																	
NOVEMBER																															
DECEMBER																															
JANUARY																															

2003 - 2004
DC Public Charter Schools
Enrollment Census SY 2003-2004



Attendance Records for the Same Student at a Charter School and a DCPS School (cont'd)

Charter

Enter Date
10/07/03

Date	Mon	Tue	Wed	Thur	Fri	Date	Mon	Tue	Wed	Thur	Fri
08/25/03	N/E	N/E	N/E	N/E	N/E	09/01/03	N/E	N/E	N/E	N/E	N/E
09/08/03	N/E	N/E	N/E	N/E	N/E	09/15/03	N/E	N/E	N/E	N/E	N/E
09/22/03	N/E	N/E	N/E	N/E	N/E	09/29/03	N/E	N/E	N/E	N/E	N/E
10/06/03	N/E					10/13/03	HOL				
10/20/03						10/27/03					
11/03/03						11/10/03		HOL			
11/17/03						11/24/03				HOL	OTH
12/01/03						12/08/03					

DCPS

Admission Date: 10/07/02
Admission Code: A5 Calendr
Withdrawal Date: 11/08/03

DATE	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	TOTAL DATE ABSENT
SEPTEMBER						X																					X					2
OCTOBER											X	X	X			X	X													X		6
NOVEMBER	X	X	X	X			X	X																								
DECEMBER																																



SPECIAL EDUCATION

Under the Uniform Per Student Funding Formula, the funding level for special education is based on weekly service hours. There is pending legislation to amend the funding formula, as shown below:

At the time of the audit, the proposed funding formula had not been enacted. Therefore, our report of special education students is based on

Funding Level	Weekly Service Hours
Level 1	Less than 6 hours
Level 2	> 6 hours and <= 15 hours
Level 3	More than 15 hours
Level 4	Separate School
Level 5	Residential

Current Funding Formula

the current formula. We have included schedules showing the impact if the proposed legislation were passed (Attachments 12 and 15). These schedules are provided for informational purposes only.

INDIVIDUAL EDUCATION PLAN

RECOMMENDATIONS

Training and written policies are needed regarding preparation of IEPs. These policies should include guidelines for:

- calculating the number of weekly services hours
- showing hours in the General Education Setting
- updating IEPs for transfer students, from a DCPS school, another charter school, or an out-of-state school
- amending, modifying, and correcting IEPs

ENGLISH LANGUAGE LEARNERS

Documentation for students in need of English as a Second Language Services has improved dramatically. The majority of schools were aware that the LEP/NEP determination should be based on written and oral testing. There were only a handful of instances where the determination was based on a home language survey or an outdated testing document.

Funding Level	Weekly Service Hours
Level 1	8 hours or Less
Level 2	> 8 hours and <= 16 hours
Level 3	> 16 hours and <= 24 hours
Level 4	> 24 hours
Level 5	Residential

Proposed Funding Formula

SYSTEMS MAINTENANCE

DUPLICATES MAY NOT BE IDENTIFIED

As discussed earlier, there were numerous potential duplicate students based on name, grade, date of birth, and student ID. Because the public charter schools and DCPS are not using a consolidated system, duplicate students cannot be identified. As part of the audit, TCBA consolidates the public charter school and DCPS records and searches for duplicate students by ID number. However, we found instances in which the same person had different ID numbers or two different people had the same ID number. Some of the duplicates, or apparent duplicates, can be eliminated by:

- DCPS MIS providing ID numbers for public charter school students rather than having the charter school staff look up the number in SIS themselves. Many of the duplicate ID

pairings were students enrolled in both a charter school and DCPS who were different people but had similar names, indicating that the number obtained by the charter school staff was for the wrong student, such as the following example where the ID number taken from SIS was for a student with a birthdate different than the one shown on the enrollment form.

- A periodic review of potential duplicate students based on information other than ID

Date of Birth (Month, Day, Year)
October 19, 1988

ID # : 8437826
BIRTH DATE : 06-22-1990

number. This can be accomplished on a limited basis once the PCSB schools and BOE schools are using their respective consolidated information systems. However, the Chartering Authorities and DCPS should pursue the possibility of interfacing the systems.

- Ensuring that all students in public charter schools be assigned DCPS ID numbers on a timely basis. Students transferring to charter schools from schools other than DCPS do not always receive a DCPS student ID number in a timely manner. In some cases, students receive a charter school student ID number that is unique to that school. This charter school ID number would not remain with the student if the student transferred to another school. Without a single student ID number, there is a greater opportunity for

the double counting of students. Most schools have converted to using DCPS ID numbers, but there seems to be a lag time between enrollment and obtaining the ID number. Based on the October 7 enrollment rosters submitted, over 2,000 students did not have DCPS ID numbers assigned. Approximately half of these were at Carlos Rosario, which was using its own ID numbers.

- Developing a process that would put controls in place to ensure that the proper parties are notified and systems updated accordingly for students who transfer between schools.

DISCREPANCIES EXIST BETWEEN AUTOMATED AND MANUAL ATTENDANCE RECORDS

There were several discrepancies between the attendance information in the schools automated attendance records and the teachers' attendance cards at some of the schools. These discrepancies include instances where critical dates had been altered (either erased and left blank or replaced with tardy) on some attendance cards. Also, in a few instances, we received two teachers' attendance cards for the same student with significantly different information. Several schools also provided blank attendance cards for students.



ADMINISTRATIVE PRACTICES

NON-STANDARD ADMINISTRATIVE POLICIES OR PROCEDURES

There are no standard administrative policies and procedures for public charter schools. While each charter school is unique, the administrative policies and procedures should be uniform to avoid critical decisions being resolved on a school-by-school basis and resulting in possible conflicts. Consistent administrative procedures among charter schools is highly encouraged in the following areas:

- **Enrollment:** Not all schools include the enrollment date on the school forms. This information is critical for accurate system documentation. In reviewing the enrollment and residency documentation, we noted inconsistencies in the dates that are used. For instance, the parent may not sign the enrollment form until a date in October, but the school has signed the form in September. In order to maintain the integrity of the documentation, all forms should be accurately dated. The actual day the student starts attending classes at a particular school should be recorded.
- **Admission:** Some schools were inconsistent with the date used. Some used the date the student enters/starts, the first day of school or the date the application was completed/submitted. Ideally, it should be the date the child started the school year at a particular school, but this is not always the case.
- **Attendance:** There are many inconsistencies in the attendance process. Examples include how often attendance is taken, how attendance is documented (slashes, blanks, letters, dates, check marks), the policy for withdraw-

ing students with repeated absences, process for documenting transfers/withdrawals, date used for transfers/withdrawals (date it is processed or last date of attendance), and updates to the enrollment system. As stated earlier, we found that not all schools follow or enforce the 20-day rule for withdrawal.

- **Residency:** Many schools handle residency compliance differently. Examples include the length of time after enrollment to provide proof of residency, the method and established dates for submitting residency documentation, repercussion for non-compliance and lastly, methods of handling suspected non-residents.



Glossary

Absent - Not in attendance on the day of the count. Students arriving during the physical count were not recorded as absent.

Audit Period - The census-type audit was conducted between October 7, 2003 and December 18, 2004, including the resolution period.

Census-type Audit - Determination of: the number of students enrolled in pre-school, pre-kindergarten, kindergarten, grades 1 through 12, and non-grade level programs in D.C. public charter schools; the number of students who are District residents; the number of tuition-paying non-resident students; and the number of special education and English minority students as of October 7, 2003, based upon a physical headcount of students and review of applicable student records. This was not an audit conducted in accordance with generally accepted auditing standards.

Chartering Authorities - D.C. Board of Education and D.C. Public Charter School Board

Count Location - Where a student is scheduled at the time of the physical audit count.

Enrollment Classifications - For purpose of the audit, students were classified as:

Enrolled - A student was included in the enrollment count if he or she was:

- In the October 7, 2003, enrollment data and present during the physical count
- In the October 7, 2003, enrollment data and absent on the day of the physical count but documentation provided evidence of enrollment and attendance
- Not in the October 7, 2003 enrollment data, but present during the count and documentation provided evidence of enrollment on October 7.

- Not Enrolled - A student was in the October 7, 2003, enrollment data, but documentation provided showed evidence that the student had withdrawn or stopped or adequate documentation was not provided.

Enrollment Date - All data presented in this report is as of October 7, 2003.

LEP/NEP - Limited English Proficiency/No English Proficiency.

Residency Classifications -

Verified - During the initial on-site file review, the student had a completed District Residency Verification Form, or applicable waiver, on file that had been properly approved. Otherwise, adequate proof of residency was provided during the resolution period.

Not Verified - There was no District Residency Verification Form on file or the form was incomplete, and adequate proof was not provided during the resolution period.

Resident Student - A student enrolled in a DCPS or public charter school who is 1) a minor whose parent, guardian, or other primary caregiver resides in the District of Columbia or 2) an adult who resides in the District of Columbia.

Residency Verification Rules - Rules for establishing verification requirements for public schools and public charter schools, as issued by the State Education Office and adopted to the District of Columbia Register on November 12, 2002 (49 DCR 10593).

Resolution Period - Period after completion of the headcount and file reviews during which prin-



cipals were provided an opportunity to resolve any outstanding issues.

Uniform Per Student Funding Formula - Formula used to determine annual operating funding for DCPS and public charter schools pursuant to the School reform Act of 1995, as amended, and the Uniform Per Student Funding Formula for Public Schools and Public Charter School Act of 1998.

Weekly Service Hours - The number of hours of specialized education provided to a student each week in accordance with the Individual Education Plan (IEP).



Attachments

2003 - 2004
DC Public Charter Schools
Enrollment Census SY 2003-2004